



February 3, 2025

The Honorable Lewis A. Kaplan  
 United States District Court, Southern District Court of New York  
 500 Pearl Street  
 New York, NY 10007

SO ORDERED

**Re: In re DiDi Global Inc. Secs. Litig., No. 1:21-cv-05807**

LEWIS A. KAPLAN, USDC

Dear Judge Kaplan:

We represent Plaintiffs in the above-referenced matter. Pursuant to the Confidentiality Stipulation and Protective Order (ECF 190), SDNY Local Rule 6.8, and Your Honor's Individual Filing Practices, we write to request permission to file under seal Plaintiffs' Letter Motion to Compel Defendant DiDi's Production of Documents and certain exhibits attached.

Plaintiffs have attached as exhibits to their Motion documents that have been designated confidential under the Protective Order or documents that contain discussions of such confidential information. Plaintiffs ask the Court to seal the following documents because they are confidential or contain confidential information:

1. DiDi's PRC Law Withhold Log, dated December 16, 2024 (Exhibit 2)
2. DiDi's Amended PRC Law Withhold Log, dated December 27, 2024 (Exhibit 3)
3. DiDi's Supplemental PRC Law Withhold Log, dated January 14, 2025 (Exhibit 4)
4. DiDi's PRC Law Redaction Log, dated December 16, 2024 (Exhibit 5)
5. Letter from DiDi's Counsel, dated July 18, 2024 (Exhibit 6)
6. Letter from Plaintiffs' Counsel, dated October 1, 2024 (Exhibit 7)
7. Letter from DiDi's Counsel, dated October 14, 2024 (Exhibit 8)
8. Letter from Plaintiffs' Counsel, dated November 29, 2024 (Exhibit 9)
9. Declaration of Professor Zhang Hong (Exhibit 10)
10. Document produced by DiDi (DIDI00421889) (Exhibit 11)
11. Document produced by China Renaissance (CRS-DIDI-00004403) (Exhibit 12)
12. Document produced by DiDi (DIDI00152729) (Exhibit 13)
13. Document produced by Morgan Stanley (MS-DIDI-00199226) (Exhibit 14)
14. Document produced by DiDi (DIDI00052737) (Exhibit 15)
15. Document produced by Goldman Sachs (GS-DIDI-00270411) (Exhibit 16)
16. Document produced by DiDi (DIDI00153432) (Exhibit 17)

The foregoing exhibits were designated “Confidential” under the Protective Order. The Protective Order provides that all “documents designated as “CONFIDENTIAL” shall not be disclosed to any person” other than, *inter alia*, the parties, their counsel, the Court, and other individuals agreed to by the parties. (ECF 190, ¶ 7.) Defendants’ designation of the materials as Confidential under the Protective Order indicates that they may contain sensitive, proprietary or confidential information about their business and operations.

Courts permit sealing requests that are narrowly tailored to prevent unauthorized dissemination of confidential business information, the protection of which outweighs the public’s right of access. *Samsung Electronics Co., Ltd. v. Microchip Technology Inc.*, 2024 WL 4169353, at \*3 (S.D.N.Y. Sept. 12, 2024); *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119 (2d Cir. 2006) (“documents may be sealed if specific, on the record findings are made demonstrating that closure is essential to preserve higher values and is narrowly tailored to serve that interest”); *see e.g., Fairstein v. Netflix, Inc.*, 2023 WL 6164293, at \*4 (S.D.N.Y. Sept. 21, 2023) (granting request to seal “proprietary and confidential materials about business operations.”); *see also Kewazinga Corp. v. Google LLC*, 2021 WL 1222122, at \*7 (S.D.N.Y. July 17, 2024) (granting in part motion to seal confidential technical information to extent redactions narrowly tailored).

The Appendix below lists the parties and their counsel of record who should have access to the sealed documents.

Respectfully submitted,

/s/ Laurence Rosen

Laurence Rosen

cc: All counsel of record via ECF



Appendix

**Defendants**

**Defendants Goldman Sachs (Asia) L.L.C., Morgan Stanley & Co. LLC, J.P. Morgan Securities LLC, BofA Securities Inc., Barclays Capital Inc., Citigroup Global Markets Inc., China Renaissance Securities (US) Inc., HSBC Securities (USA) Inc., UBS Securities LLC, and Mizuho Securities USA LLC**

O'MELVENY & MYERS LLP

Jonathan Rosenberg  
Abby F. Rudzin

**Defendant DiDi Global Inc.**

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

Michael Charles Griffin  
Robert Alexander Fumerton  
Scott D. Musoff

QUINN EMANUEL URQUHART & SULLIVAN LLP

Renita Sharma  
Richard Corey Worcester

**Defendants Will Wei Cheng, Alan Yue Zhuo, Jean Oing Liu, Jingshi Zhu, and Adria Perica**

QUINN EMANUEL URQUHART & SULLIVAN LLP

Renita Sharma  
Richard Corey Worcester

**Defendant Zhiyi Chen**

WILSON SONSINI GOODRICH & ROSATI, P.C.

Sheryl Shapiro Bassin  
Alexander Luhning  
Ignacio E. Salceda

**Defendant Martin Chi Ping Lau**

GIBSON, DUNN & CRUTCHER LLP

Matthew Stewart Khan  
Kevin James White

**Defendant Kentaro Matsui**

BLANK ROME LLP

Andrew Mitchell Kaufman  
Emily Grasso

SULLIVAN AND CROMWELL

Jefferey T. Scott

QUINN EMANUEL URQUHART & SULLIVAN LLP

Renita Sharma  
Richard Corey Worcester

**Defendant Daniel Yong Zhang**

SIMPSON THACHER & BARTLETT LLP

Bo Bryan Jin  
Stephen Patrick Blake

QUINN EMANUEL URQUHART & SULLIVANT LLP

Renita Sharma  
Richard Corey Worcester

AKIN GUMP STRAUSS HAUSER & FELD LLP

Ziwei Xiao

**Plaintiffs**

THE ROSEN LAW FIRM, P.A.

Laurence M. Rosen  
Jing Chen  
Daniel Tyre-Karp  
Robin Howald  
Yitzchok Fishbach

GLANCY PRONGAY & MURRAY LLP

Kara Wolke  
Leanne Heine Solish